

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION**

CORINA CAMACHO, Individually and on behalf of G.M., a Minor; TANISHA RODRIGUEZ, Individually and on behalf of G.R., a Minor; and SELENA SANCHEZ, Individually and on behalf of D.J., a Minor.; AMANDA ESCOBEDO, Individually and on behalf of A.T., a Minor and on behalf of A.E., a Minor; and ANGELICA TALLEY, Individually and on behalf of M.T., a Minor.

Plaintiffs,

v.

THE UVALDE CONSOLIDATED INDEPENDENT SCHOOL DISTRICT; PEDRO “PETE” ARREDONDO, an Individual; THE CITY OF UVALDE; MARIANO PARGAS, an Individual; MANDY GUTIERREZ, an Individual; UVALDE COUNTY; SHERIFF RUBEN NOLASCO, an Individual; TEXAS DEPARTMENT OF PUBLIC SAFETY; DANIEL DEFENSE, LLC, a Limited Liability Company; OASIS OUTBACK, LLC, a Texas Limited Liability Company; FIREQUEST INTERNATIONAL, INC., an Arkansas Corporation; MOTOROLA SOLUTIONS, INC., a Delaware Corporation; JOHN DOE COMPANY 1, and JOHN DOES 1-100

Defendants.

Case No. 2:22-cv-00048-AM-CW

JURY DEMANDED

**PLAINTIFFS’ MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO
DEFENDANT MANDY GUTIERREZ’S MOTION TO DISMISS PLAINTIFFS’
ORIGINAL COMPLAINT**

Plaintiffs file this Motion for Leave to Extend Time to Respond to Defendant Mandy Gutierrez’s Motion to Dismiss Plaintiffs’ Original Complaint, and would respectfully show the Court:

1. Defendant Mandy Gutierrez filed a Motion to Dismiss under Federal Rule of Civil Procedure 12(B)(1) and (6) before being served. Other defendants in this matter are in the process of signing waivers or being served with Plaintiffs recently submitted First Amended Complaint that is currently pending for filing with the Court (Please See **Exhibit A**, letter to the Court dated December 20, 2022). Defendant Mandy Gutierrez's Motion to Dismiss concerns Plaintiffs' Original Complaint that is no longer the operative complaint.

2. For these reasons, Plaintiffs request an extension of time to respond to Defendant's Mandy Gutierrez Motion to Dismiss, or that the Court enter an order deeming it moot in light of the First Amended Complaint. Due to the nature and complexity of this case, and in interests of efficiency and judicial economy, Plaintiffs further request that a briefing schedule be entered for Motions to Dismiss once all defendants have been served so Plaintiffs may file a consolidated response.

Dated: December 29, 2022

**BAUM, HEDLUND, ARISTEI, &
GOLDMAN, P.C.**

/s/ Stephanie Sherman

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Attorneys for Plaintiffs

EXHIBIT A



December 20, 2022

VIA U.S CERTIFIED MAIL ONLY

United States District Court – Western District of Texas
U.S. District Clerk's Office
111 East Broadway, Room L100
Del Rio, Texas 78840

Re: *Corina Camacho, et al. v. The U.C.I.S.D., et al.*
Case No.: 2:22-cv-00048-AM-CW

Dear District Clerk's Office:

Enclosed for filing is Plaintiffs' First Amended Complaint. Under the Court's Administrative Policies and Procedures for Electronic Filing, Section 5, this is being sent via mail for filing because new parties have been added. But please note, no defendants have been served yet in this matter. We look forward to receiving a conformed copy of the First Amended Complaint and the Summons on the First Amended Complaint.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Stm &', is positioned above a horizontal line that separates it from the typed name and contact information.

Stephanie Sherman, Esq.
BAUM HEDLUND ARISTEI & GOLDMAN, PC
ssherman@baumhedlundlaw.com

Enclosures:

1. Plaintiffs' First Amended Complaint

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2022, a true and correct copy of the foregoing was served on counsel of record via the CM/ECF system.

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